

REMARKS

The Office Action mailed August 9, 2006, considered claims 2-4, 7-9, 12, 14-16, 18-21, 29-39. Claim 30 was objected to because of the following informality: Claim 30 depends from a canceled claim (Claim 26). Claims 2-4, 12, 14, 18-21, 29, 30, 31, 34, 36-39 were rejected under 35 U.S.C. 103(a) as being unpatentable over *Balabine* et al. (US 6,442,548) hereinafter *Balabine* in view of *Mani* et al. (6,654,734) hereinafter *Mani*. Claim 32 was rejected under 35 U.S.C. 103(a) as being unpatentable over *Balabine* in view of *Mani* further in view of *Traversat* et al. (US 6,366,954) hereinafter *Traversat*. Claim 7 and 15 were rejected under 35 U.S.C. 103 (a) as being unpatentable over *Balabine* in view of *Mani* further in view of *Omoigui* (US 2003/0126136) hereinafter *Omoigui*. Claims 8 and 16 were rejected under 35 U.S.C. 103(a) as being unpatentable over *Braden-Harder* et al. (5,630,121) hereinafter *Braden-Harder*. Claim 9 was rejected under 35 U.S.C. 103(a) as being unpatentable over *Balabine* in view of *Mani* further in view of *Malkemus* et al. (US 5,619,692) hereinafter *Malkemus*. Claims 33 and 35 were rejected under 35 U.S.C. 103(a) as being unpatentable over *Balabine* in view of *Mani* et al. further in view of <http://en.wikipedia.org/w/index.php?title=XPath&oldid=1315639> (xPath) hereinafter *Xpath*.<sup>1</sup>

By this paper, claims 30, 31, 37, 38 and 39 have been amended. Claims 2-4, 7-9, 14-16, 18-21, and 29-29 remain pending, of which claims 31, 37, 38 and 39 are the only independent claims.

The claims of the application are generally directed to linking different objects in a database by defining relationships between different attributes of the different objects. A given defined relationship can be identified by an assigned view name. For example, the Applicant's specification at page 13 paragraphs [0023] and [0024] illustrates an example where a view name "OrgChart" defines an attribute relationship where the attribute of one object is the Manager attribute and the different attribute of a different object is a DirectReports attribute. The assigned view name is then used by a client to request an object in the database. The relationships implicit in the assigned view name can be used to traverse a path to a particular object in the database. For example, Applicant's specification at page 18, paragraph [0030], illustrates an example with a client request, "OrgChart/John/Jane/Alice." Using this format, relationships can be traversed up and down instead of in a singular direction as is disclosed by *Balabine*.

Claim 31, for example, is a server side perspective claim which recites storing objects in a database, defining relationships linking different attributes of different objects, assigning the relationships a view name, and receiving requests from clients using the view name and path elements to process the client requests to return data to the clients. Claim 38 is similar to claim 31 except it is recited from a client perspective. Claims 37 and 39 are computer program product claims corresponding to claims 31

---

<sup>1</sup> Although the prior art status of the cited art is not being challenged at this time, Applicant reserves the right to challenge the prior art status of the cited art at any appropriate time, should it arise. Accordingly, any arguments and amendments made herein should not be construed as acquiescing to any prior art status of the cited art.

and 38 respectively. The cited art simply does not teach what is recited by the claims of the present application.

With regards to *Balabine*, the Examiner admits that *Balabine* does not teach the elements of "relationships linking different attributes of different objects, wherein defining the relationships includes creating pointers linking each object by a defined attribute relationship with another object" and "a first expression component reciting a view name, wherein the view name is a particular defined name of a particular one of the defined attribute relationships."

Applicants respectfully submit that *Mani* does not compensate for the deficiencies of *Balabine*. In particular, *Mani* is directed to querying a repository of XML documents. Abstract. This is accomplished through the use of a query language that uses an XML syntax. Abstract. However, *Mani* fails to disclose a defined linking relationship between different attributes of different objects where the defined relationship is used as a view name for accessing a database object. While *Mani* does show relationships between parent and child graph nodes or elements within the same schema (col. 3, lines 55-57 and col. 6, lines 26-28), these parent child relationships have been specifically disclaimed by the claims of the present application. Note that *Mani* teaches that an XML structured document is a set of parent child relationships. See *Mani* at col. 3, lines 55-56, col. 4, lines 15-19 and col. 9, lines 47-54 (a child is a node in a graph, a parent is a node with a child, an XML document is viewed by the query system as a graph).

Further, while *Mani* does discloses inter-document linking (col. 9, lines 47-50) this inter-document linking represent nothing more than reference to hyperlinks linking one document to another document on a web site. Col. 4, lines 65-67. Thus, an entire document is linked to an entire document rather than objects being linked by their attribute relationships. Specifically, while *Mani* discloses documents, which include nodes with attributes, (col. 9, lines 52-54), it is not attributes from one node or document that are linked to different attributes from a different node or document, but rather entire documents that are linked together. See col. 9, lines 48-50 (a graph, i.e. XML document, is linked to another graph by an edge representing an inter-document link).

*Mani* also discloses gathering of an attribute relation set. Col. 6, lines 26-29 and lines 59-68. However, it appears that this attribute relation set is for a given element (as opposed to different objects) and is simply an enumeration of attributes for that element. It does not, however, link different attributes for different objects as is recited by the claims of the present application.

Additionally, *Mani* is completely devoid of any explicit disclosure or suggestion that a view name defining linking of different attributes in different objects being used as a client request element. The portions of *Mani* cited by the Examiner for showing this element, in fact show something completely

different as discussed above. Specifically, at col. 9, lines 50-52, *Mani* only shows inter-document links and at col. 6, lines 30-34, *Mani* only shows a variety of relationships other than linking different attributes of different objects. Further, the references to *Balabine*, only discuss parent-child relationships.

The additional reference cited by the Examiner are cited for various features of various dependent claims, but do not compensate for the deficiencies of *Balabine* and *Mani*.

In view of the foregoing, Applicants respectfully submit that the other rejections to the claims are now moot and do not, therefore, need to be addressed individually at this time. It will be appreciated, however, that this should not be construed as Applicants acquiescing to any of the purported teachings or assertions made in the last action regarding the cited art or the pending application, including any official notice. Instead, Applicants reserve the right to challenge any of the purported teachings or assertions made in the last action at any appropriate time in the future, should the need arise. Furthermore, to the extent that the Examiner has relied on any Official Notice, explicitly or implicitly, Applicants specifically request that the Examiner provide references supporting the teachings officially noticed, as well as the required motivation or suggestion to combine the relied upon notice with the other art of record.

In the event that the Examiner finds remaining impediment to a prompt allowance of this application that may be clarified through a telephone interview, the Examiner is requested to contact the undersigned attorney.

Dated this 3<sup>rd</sup> day of October, 2006.

Respectfully submitted,



RICK D. NYDEGGER  
Registration No. 28,651  
JENS C. JENKINS  
Registration No. 44,803  
J. LAVAR OLDHAM  
Registration No. 53,409  
Attorneys for Applicant  
Customer No. 047973

JLO:JCJ:gcd:ahy  
AHY0000001671V001